

Joseph J. Tabacco, Jr. (SBN 75484)  
 Christopher T. Heffelfinger (SBN 118058)  
 Todd A. Seaver (SBN 271067)  
 Matthew Ruan (SBN 264409)  
**BERMAN DEVALERIO**  
 One California Street, Suite 900  
 San Francisco, CA 94111  
 Telephone: (415) 433-3200  
 Facsimile: (415) 433-6382  
 Email: jtabacco@bermandevalerio.com  
 cheffelfinger@bermandevalerio.com  
 tseaver@bermandevalerio.com  
 mruan@bermandevalerio.com

Manuel J. Dominguez  
**BERMAN DEVALERIO**  
 3507 Kyoto Gardens Drive, Suite 200  
 Palm Beach Gardens, FL 33410  
 Telephone: (561) 835-9400  
 Facsimile: (561) 835-0322  
 Email: jdominguez@bermandevalerio.com

*Counsel for Plaintiffs & the Proposed Class*

Keith Eggleton (SBN 159842)  
 Dylan J. Liddiard (SBN 203055)  
**WILSON SONSINI GOODRICH & ROSATI, PC**  
 650 Page Mill Road  
 Palo Alto, CA 94304  
 Telephone: (650) 493-9300  
 Facsimile: (650) 565-5100  
 Email: keggleton@wsgr.com  
 dliddiard@wsgr.com

Jonathan M. Jacobson (*pro hac vice*)  
**WILSON SONSINI GOODRICH & ROSATI, PC**  
 1301 Avenue of the Americas, 40th Floor  
 New York, NY 10019  
 Telephone (212) 999-5800  
 Facsimile: (212) 999-5899  
 Email: jjacobson@wsgr.com

*Counsel for Defendant Netflix, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**IN RE ONLINE DVD RENTAL  
 ANTITRUST LITIGATION**

**Master File No. 4:09-md-2029 PJH**

**MDL No. 2029**

**Hon. Phyllis J. Hamilton**

**This document relates to:  
 ALL ACTIONS**

**STIPULATION AND [PROPOSED] ORDER  
 EXTENDING EXPERT DISCOVERY AND  
 BRIEFING SCHEDULE**

1 The undersigned parties hereby stipulate to an adjustment of the following deadlines contained  
2 in the Court's February 16, 2011 Order Extending Expert Discovery and Briefing Schedule (ECF No.  
3 336):

- 4 1. Rebuttal expert disclosures from March 29, 2011 to April 6, 2011;
- 5 2. Dispositive motions from May 7, 2011 to May 11, 2011;
- 6 3. Oppositions to dispositive motions from June 15, 2011 to June 17, 2011;
- 7 4. Replies from July 20, 2011 to July 22, 2011; and
- 8 5. Any *Daubert* motions shall be briefed on the same schedule as the above-described  
9 schedule for dispositive motions.

10 DATED: March 16, 2011

Respectfully submitted,

11 BY: /s/ Matthew Ruan

12 Matthew Ruan

13 Joseph J. Tabacco, Jr.  
14 Christopher T. Heffelfinger  
15 Todd A. Seaver  
16 **BERMAN DE VALERIO**  
17 One California Street, Suite 900  
18 San Francisco, CA 94111  
19 Telephone: (415) 433-3200  
20 Facsimile: (415) 433-6382  
21 Email: jtabacco@bermandevalerio.com  
22 cheffelfinger@bermandevalerio.com  
23 tseaver@bermandevalerio.com  
24 mruan@bermandevalerio.com

25 Manuel J. Dominguez  
26 **BERMAN DE VALERIO**  
27 3507 Kyoto Gardens Drive, Suite 200  
28 Palm Beach Gardens, FL 33410  
Telephone: (561) 835-9400  
Facsimile: (561) 835-0322  
Email: jdominguez@bermandevalerio.com

BY: /s/ Dylan J. Liddiard  
Dylan J. Liddiard

Keith Eggleton  
**WILSON SONSINI GOODRICH & ROSATI, PC**  
650 Page Mill Road  
Palo Alto, CA 94304  
Telephone: (650) 493-9300  
Facsimile: (650) 565-5100  
Email: keggleton@wsgr.com  
dliddiard@wsgr.com

Jonathan M. Jacobson  
**WILSON SONSINI GOODRICH & ROSATI, PC**  
1301 Avenue of the Americas, 40th Floor  
New York, NY 10019  
Telephone (212) 999-5800  
Facsimile: (212) 999-5899  
Email: jjacobson@wsgr.com

*Counsel for Defendant Netflix, Inc.*

**IT IS SO ORDERED.**

DATED: 4/18/11

HONORABLE \_\_\_\_\_  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
LEON J. JUDGE



**E-FILING SIGNATURE ATTESTATION**

I, Matthew Ruan, am the ECF User whose ID and password was used to file this  
**STIPULATION AND [PROPOSED] ORDER EXTENDING EXPERT DISCOVERY AND  
BRIEFING SCHEDULE.** In compliance with General Order 45 ¶ X.B., I hereby attest that Dylan J.  
Liddiard, counsel for Defendant Netflix, Inc., concurred in this filing. A record of such concurrence  
will be maintained for production to or inspection by the Court if so ordered until one year after final  
resolution of the above-captioned action.

DATED: March 16, 2011

BY: /s/ Matthew Ruan  
Matthew Ruan